

Exhibit A

Mark C. Mao, CA Bar No. 236165
 Beko Reblitz-Richardson, CA Bar No. 238027
BOIES SCHILLER FLEXNER LLP
 44 Montgomery St., 41st Floor
 San Francisco, CA 94104
 Tel.: (415) 293-6800
 mmao@bsflp.com
 brichardson@bsflp.com

Jesse Panuccio (admitted *pro hac vice*)
BOIES SCHILLER FLEXNER LLP
 1401 New York Ave, NW
 Washington, DC 20005
 Tel.: (202) 237-2727
 Fax: (202) 237-6131
 jpanuccio@bsflp.com

Amanda K. Bonn, CA Bar No. 270891
SUSMAN GODFREY L.L.P.
 1900 Avenue of the Stars, Suite 1400
 Los Angeles, CA 90067
 Tel: (310) 789-3100
 Fax: (310) 789-3150
 abonnn@susmangodfrey.com

Attorneys for Plaintiffs

William Christopher Carmody
 (admitted *pro hac vice*)
 Shawn J. Rabin (admitted *pro hac vice*)
 Steven M. Shepard (admitted *pro hac vice*)
 Alexander P. Frawley
 (admitted *pro hac vice*)
SUSMAN GODFREY L.L.P.
 1301 Avenue of the Americas,
 32nd Floor
 New York, NY 10019
 Tel.: (212) 336-8330
 bcarmody@susmangodfrey.com
 srabin@susmangodfrey.com
 ssh Shepard@susmangodfrey.com
 afrawley@susmangodfrey.com

John A. Yanchunis (admitted *pro hac vice*)
 Ryan J. McGee (admitted *pro hac vice*)
 Michael F. Ram (admitted *pro hac vice*)
 Ra O. Amen (admitted *pro hac vice*)
MORGAN & MORGAN
 201 N. Franklin Street, 7th Floor
 Tampa, FL 33602
 Tel.: (813) 223-5505
 jyanchunis@forthepeople.com
 rmcgee@forthepeople.com
 mram@forthepeople.com
 ramen@forthepeople.com

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
 MUNIZ, ELIZA CAMBAY, SAL
 CATALDO, EMIR GOENAGA, JULIAN
 SANTIAGO, HAROLD NYANJOM,
 KELLIE NYANJOM, and SUSAN LYNN
 HARVEY, individually and on behalf of all
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**[PROPOSED] ORDER GRANTING
 PLAINTIFFS' REQUEST TO DISCLOSE
 PROTECTED MATERIALS TO
 CERTAIN EXPERT CONSULTANTS**

The Honorable Alex G. Tse
 Courtroom A – 15th Floor
 Trial Date: Not Yet Set

[PROPOSED] ORDER

Before the Court is the parties' joint letter brief regarding Google's request for a protective order absolving it from any obligation to produce documents that were produced in *Brown v. Google*, 4:20-CV-3664-YGR (N.D. Cal.).

As the "party wish[ing] to resist discovery, [Google] must carry the heavy burden of showing why discovery should be denied." *Dairy v. Harry Shelton Livestock, LLC*, No. 18-CV-6357-RMI, 2021 WL 4476778, at *1 (N.D. Cal. Sept. 30, 2021). Discovery may be denied only if "the discovery request is overly broad, unduly burdensome, irrelevant or disproportional to the needs of the case." *Id.*

Google has not carried its burden. Many of the documents in *Brown* are likely to be relevant to this case, as plaintiffs in both cases allege that Google collected and used data without consent. Plaintiffs have adequately identified those documents, limiting their request to documents containing at least one of three terms at the heart of this case: "WAA," "sWAA," and "Firebase." Even if a document-by-document review were necessary, Google has not shown that such a review would be unduly burdensome; indeed, Google has not even identified the volume of documents at issue.

Google's request for a protective order is DENIED. Google must produce all documents produced in *Brown* returned by searching for "WAA," "sWAA," or "Firebase."

IT IS SO ORDERED.

DATED: _____

Honorable Alex G. Tse
United States Magistrate Judge